

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND  
NORTHERN DIVISION

WILLIAM C. BOND,

\*

Plaintiff

\*

v.

\*

Civil Action No.: MJG-01-CV-2600

KENNETH BLUM, SR., *et al.*,

\*

Defendants

\*

\* \* \* \* \*

PLAINTIFF'S RESPONSE TO DEFENDANT ADELBERG'S  
MOTION FOR SANCTIONS (PAPER NO. 99)

Plaintiff, William C. Bond, by and through his attorneys, Howard J. Schulman and Schulman & Kaufman, LLC, states as follows:

1. Plaintiff hereby incorporates by reference all prior responses concerning attorneys' fees and sanctions in this matter, including, but not limited to, Paper Nos. 50 and 102, Supplemental Memorandum filed March 12, 2003 (Paper No. 88) and Response to Defendant Law Firms' Motion Requesting Attorneys' Fees Under 17 U.S.C., § 505, filed February 24, 2003 (Paper No. 84).
2. Plaintiff further notes that Defendant did not comply with Rule 11(c)(1)(A).
3. Defendant seeks sanctions but, Plaintiff again points to the affidavit of counsel and the investigation conducted by his counsel and two other attorneys (Paper No. 50).

WHEREFORE, for the aforementioned reasons and those previously stated heretofore, Plaintiff, William C. Bond, respectfully requests that Defendants' Motions for Attorneys' Fees and for Sanctions be denied.

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